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5 Attorneys for Debtor
SARA NEWSOME BURNS
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7 **UNITED STATES BANKRUPTCY COURT**
8 **SOUTHERN DISTRICT OF CALIFORNIA**
9

10 In re:
11 SARA NEWSOME BURNS, an individual,
12
13 Debtor,
14

CASE NO. 99-33191-B7

**EX PARTE MOTION FOR EXTENSION
OF TIME TO FILE DEBTOR'S
SCHEDULES, STATEMENT OF
AFFAIRS AND STATEMENT OF
EXECUTORY CONTRACTS**

[NO HEARING SCHEDULED]

15
16 The motion of the above-named Debtor ("Movant") respectfully represents:
17

18 1. Your Movant filed a voluntary petition for relief under Chapter 7 of the Bankruptcy
Code on August 13, 1999. Richard M Kipperman has been appointed as the Chapter 7 trustee.

19 2. August 30, 1999, is the last day for the filing of your Movant's Schedules,
20 Statement of Affairs and Statement of Executory Contracts in accordance with the provisions of
21 Rules 1007(c) and 9006(a) of the Federal Rules of Bankruptcy Procedure.

22 3. Movant finds that the various records from which the Schedules and Statement of
23 Affairs must be compiled are much more complex than initially anticipated and has not been able
24 to provide her counsel with the required information which must be reviewed and analyzed by
25 counsel to ensure that it is accurately characterized on the Schedules and Statements. Although
26 Movant has proceeded with reasonable diligence and dispatch to complete the gathering and
27 presentation of information as required in the Schedules and Statements, however, Movant is
28 unable to complete that process by August 30, 1999.

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U.S. BANKRUPTCY CT.
SO. DIST. OF CALIF.

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1 4. Your Movant believes that an additional eight (8) days (i.e. to September 7, 1999)
2 will be required for the completion of her Schedules and Statement of Affairs.

3 5. The meeting of creditors pursuant to Section 341(a) of the United States
4 Bankruptcy Code has been set for September 15, 1999. Accordingly, the extension herein
5 requested (i.e., to September 7, 1999, which is five (5) court days before the hearing) will not
6 prejudice any creditor or other party in interest.

7 6. The provisions of Rule 1007(a)(4) of the Federal Rules of Bankruptcy Procedure
8 provide, in pertinent part, as follows:

9 **1007(a)(4) EXTENSION OF TIME**

10 Any extension of time for the filing of the lists required by this subdivision may be
11 granted only on motion for cause shown and on notice to the United States trustee
and to any trustee. . .

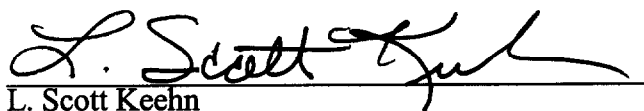
12 **WHEREFORE**, your Movant prays for relief as follows:

13 1. That the Court in accordance with and pursuant to the authority provided by Rule
14 1007(a)(4) of the Federal Rules of Bankruptcy Procedure grant an extension of the time within
15 which the Debtor may file her Schedules, Statement of Affairs and Statement of Executory
16 Contracts to and including September 7, 1999; and,

17 2. For such other and further relief as the Court deems just and proper.

18
19 Dated: 8-26-99

ROBBINS & KEEHN
A Professional Corporation

20
21 By: 
22 L. Scott Keehn
23 Charles F. Robbins
24 Attorneys for Debtor, **SARA NEWSOME BURNS**
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